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Objection Due: January 13, 2016

Hearing Date: January 27, 2016

Time: 10:00 a.m.

Attorneys for Aaron Blecker

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL) SIPA LIQUIDATION (Substantively Consolidated)

NOTICE OF MOTION FOR AN ORDER COMPELLING THE TRUSTEE TO ALLOW AARON BLECKER'S SIPC CLAIM

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the November 17, 2015 Declaration of Bernard L. Madoff, Aaron Blecker, by undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004-1408, on January 27, 2016, at 10:00 a.m., or as soon thereafter as counsel may be heard, seeking entry of an order compelling Irving H. Picard, Trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC, to allow Blecker's SIPC claim.

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PLEASE TAKE FURTHER NOTICE that papers in opposition to the motion shall be

served and filed on January 13, 2016.

Dated: December 28, 2015

New York, New York

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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